Table 1. Comparison of Penalty Amounts Owed to Modeled Calculations - Tier 1

		Tier 1 recalculations				
Row #		October	November	December	Total	
1.	"Actual" Penalties owed, Oct-Dcc 2000	\$379,000	\$447,948	\$395,357	\$1,222,305	
2.	Re-calculated penalty amounts	\$886,500	\$1,119,175	\$1,396,400	\$3,402,075	
3.	All Measurements "High"	\$3,360,750	\$1,826,750	\$2,076,950	\$7,264,450	

Notes:

Disclaimers provided by Ameritech in their response to DR MKP20:

1) MKP 19 assumes all CLECs are eligible for remedies. Actual remedies are not paid to every single CLEC.

2) MKP 19 assumes the first month of data is in September. For actual remedies, the CLEC could have signed the remedy plan during any month. Therefore, the number of consecutive months in disparity may differ.

Table 2. Alternative Scenarios

		Penalty Estimates – Tier 1			
Alternative Scenario #	Description	October	November	December	Total
AS1.	Remove k-factor Exclusions	\$1,249,100	\$1,298,225	\$1,577,600	\$4,124,925
AS2.	AS1, and All Penalties "High"	\$4,046,200	\$2,215,050	\$2,536,950	\$8,798,200
AS3.	AS2, and Penalties 2x "High"	\$8,092,400	\$4,430,100	\$5,073,900	\$17,596,400
AS4.	AS2, and Penalties 3x "High"	\$12,138,600	\$6,645,150	\$7,610,850	\$26,394,600

I.C.C. DOCKET HAD OI-0120
Staff Exhibit No. 2.02
Witness Dr. Patrick
Date 8/14/01 Reporter

Docket No. 01-0120 Staff Ex. 2.0 2 Attachment 2.1

Table 3. Comparison of Penalty Amounts Owed to Modeled Calculations – Tier 2

			Tier 2 recalculations			(Oct-Dec)	(Nov-Dec)
Row#		October	November	December	3-month Total	2-month Total	
1.	"Actual" Pe	nalties owed, Oct-Dec 2000	\$1,355,300	\$991,000	\$1,181,300	\$3,527,600	\$2,172,300
2.	Re-calculated penalty amounts			\$1,215,400	\$1,460,800	1	\$2,676,200
	AS2.	AS1, and All Penalties "High"		\$1,475,000	\$1,626,000	1	\$3,101,000
	AS3.	AS2, and Penalties 2x "High"		\$2,950,000	\$3,252,000)	\$6,202,000
	AS4.	AS2, and Penalties 3x "High"		\$4,425,000	\$4,878,000		\$9,303,000